IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

BARRY E. ROTHERMEL : CASE NO. 1-18-01415-HWV

dba LEBANON CHIROPRACTIC OFFICE :

PATRICIA ROTHERMEL : CHAPTER 13

Debtors

DEUTSCHE BANK NATIONAL TRUST : COMPANY, as Trustee, on behalf of the : holders of the J.P. Morgan Mortgage Acquisition:

Trust 2007-CH5 Asset Backed Pass-Through :

Certificates, Series 2007-CH5 : Movant :

v. :

BARRY E. ROTHERMEL :

dba LEBANON CHIROPRACTIC OFFICE : PATRICIA ROTHERMEL :

Respondents

DEBTORS' RESPONSE TO MOTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH5 Asset Backed Pass-Through Certificates, Series 2007-CH5 FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, come Debtors, Barry E. Rothermel and Patricia Rothermel, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded that Movant is the holder of the mortgage.
 - 5. Denied. Debtors have no knowledge. Strict proof is demanded.

- 6. Admitted.
- 7. Admitted. Debtors offer to pay arrears through an Amended Plan.
- 8. Admitted in part and denied in part. See response to paragraph 7.
- 9. Denied. Debtors have not knowledge. Strict proof is demanded.
- 10. Denied. No Attorney's fees or costs are owed. See 11 U.S.C. § 506(b).

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,

Gary J. Janblum,

Attorney I.D. No. 42606

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. (717) 558-8990

gary.imblum@imblumlaw.com

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Attorney for Debtors

DATED: 11/5/18

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH5 Asset Backed Pass-Through Certificates, Series 2007-CH5 FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE CHAPTER 13 TRUSTEE VIA E-SERVICE

JAMES C. WARMBRODT, ESQUIRE KML LAW GROUP, P.C. COUNSEL FOR MOVANT VIA E-SERVICE dehartstaff@pamd13trustee.com

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IMBLUM LAW OFFICE, P.C.

Carol V. Shay, Paralegal

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. (717) 558-8990

gary.imblum@imblumlaw.com

For Debtors

DATED: 11/5/18